



FEDERAL ELECTION COMMISSION  
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**MEMORANDUM**

TO: The Commission

FROM: Lawrence H. Norton  
General Counsel

BY: Rhonda J. Vosdingh  
Associate General Counsel

Mark Shonkwiler  
Assistant General Counsel

April J. Sands  
Attorney

RE: MUR 5092 – Supplement to General Counsel's Report #3, dated  
February 14, 2003

**ACTIONS RECOMMENDED:** Take no action and close the file as to Respondents whom the Commission previously voted to "take no action at this time" in July 2001.

**DISCUSSION:** On February 20, 2003, this Office circulated General Counsel's Report #3, which recommended that the Commission approve the conciliation agreement for Michael Lazaroff; take no further action against various individuals who served as conduits and send letters of admonishment; approve the appropriate letters and close the file. Due to an administrative oversight, this Office did not include a Recommendation referencing certain Respondents as to whom the Commission previously voted to "take no action at this time" on July 10, 2001 in response to the First General Counsel's Report. To ensure that the record is clear with respect to all named Respondents, this Office submits the proposed Recommendation on a 24-hour no objection basis to be considered along with General Counsel's Report #3 dated February 14, 2003.

On July 10, 2001, the Commission voted to "take no action at this time" with respect to Gordon Ankney, Rhonda Thomas, William Falk, Jan Alonzo, Charles Binger, Gary Heifetz, Thomas Jayne, Thomas Litz, and Carnahan for Senate Committee and Lisa Lindsey, as Treasurer in connection with allegations of possible 2 U.S.C. § 441f

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contributions to the Carnahan for Senate committee. All of the respondent Thompson Coburn employees denied reimbursement for contributions to the Carnahan committee. See First General Counsel's Report dated June 22, 2001. In addition, the Carnahan committee denied that the contributions it received from these individuals were tainted. The Commission adopted this Office's recommendation to "take no action at this time." Further investigation by this Office has revealed no evidence indicating that the contributions to the Carnahan for Senate committee were reimbursed by Michael Lazaroff.

The Commission also voted to "take no action at this time" with respect to Thompson Coburn LLP.

### RECOMMENDATIONS

1. Take no action with respect to Gordon Ankney, Rhonda Thomas, William Falk, Jan Alonzo, Charles Binger, Gary Heifetz, Thomas Jayne, Thomas Litz, Carnahan for Senate Committee and Lisa Lindsey, as Treasurer, and Thompson Coburn LLP;
2. Approve the appropriate letters;
3. Close the file.

23-04-406-1174